

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Student DOE #1

Plaintiff,

v.

Donald J. TRUMP, in his official
capacity, President of the United
States of America;

John TSOUKARIS, in his official capacity
as ICE Enforcement and Removal
Operations New Jersey Field Office
Director;

Todd M. LYONS, in his official capacity,
Acting Director, Immigration and
Customs Enforcement, U.S. Department
of Homeland Security; and

Kristi NOEM, in her official capacity,
Secretary, U.S. Department of Homeland
Security;

Defendants.

Case No.

**NOTICE TO COURT OF CONFLICT
WITH SCHEDULED PRELIMINARY
INJUNCTION HEARING AND
REQUEST FOR ALTERNATE DATE**

Pursuant to this Court's April 18th Order (ECF 13), Plaintiff notifies the court that both local counsel and pro hac vice counsel have a pre-existing conflict on the date of the proposed preliminary hearing. Pro Hac Vice counsel will be speaking in Zagreb, Croatia at the Rome District Chapter of the American Immigration Lawyers Association on the same day and then

taking a week vacation after the speaking engagement. Pro hac vice counsel returns to the country on the 14th of May and then must leave on the 15th of May to pick up his daughter from college. As a result, pro hac vice counsel is not available between May 5th and May 17th, but would be available before or after that date.

Additionally, if possible, local counsel has his daughter on Mondays and Tuesdays, so those days are hard for him to find childcare, and if we can schedule on days other than Monday or Tuesday, that would be most convenient for local counsel.

Plaintiff has not had the opportunity to confer with counsel for the Defendants on this motion.

Dated: April 18, 2025

Respectfully submitted,
/s/ Jeff Joseph
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